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March 7, 2019

**VIA ECF**

Hon. Gabriel W. Gorenstein  
Chief United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, New York, NY 10007-1312

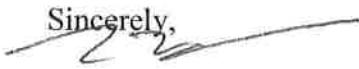
Re: Addendum to Defendant's Pre-Sentencing Submission 18-cr-000469

Dear Judge Gorenstein,

We write to provide the Court with some updated information. As noted on page 25 of the latest PSIR, filed on March 13, 2019, Ms. Okoumou "has been in compliance with all terms and conditions of her pretrial release." Looking to the condition emphasized by the Court--seeking and maintaining employment--Ms. Okoumou has submitted twenty-eight (28) applications for potential employment. Email verifications of these applications are attached as Exhibit A. On Tuesday, March 4, 2019, Ms. Okoumou attended two in-person interviews, one with the ETG Book Café and Neighborhood Stage, and one at the Monument Lab. On Wednesday, March 13, 2019, she participated in one telephone interview with Essential Cannabis Oil Company. She is scheduled on March 18, 2019 for an in-person interview at the Salvage Art Institute. The three in-person interviews may be confirmed by Pre-Trial Services.

Also attached hereto as Exhibit B is the entire sentencing transcript in United States v. Andrew DeJesus Mercado, (aka "Tito Kayak") 01 Cr. 132 (MHD). Judge Dolinger made a number of points, some helpful to the defense and others helpful to the prosecution's position. Overall, it is an interesting read as to the way in which one Magistrate-Judge chose to handle an unrepentant, persistent civil-disobedient. As an epilogue, the U.S. Navy eventually did cease using Mr. Mercado's home as a bomb-testing range, bowing to massive and widespread protest. Following the complete power outage across Puerto Rico in the aftermath of Hurricane Maria, and the Trump Administration's indifference, Tito Kayak won local acclaim for using both his skills as a climber and as an electrician to personally restore electricity to members of the community. [https://www.huffingtonpost.com/entry/bringing-the-light-in-puerto-rico-after-last-years-horrific-hurricane-season\\_us\\_5b5f4f94e4b0de86f4999a6b](https://www.huffingtonpost.com/entry/bringing-the-light-in-puerto-rico-after-last-years-horrific-hurricane-season_us_5b5f4f94e4b0de86f4999a6b).

Sincerely,



Ronald L. Kuby  
Rhidaya "Rhiya" Trivedi

cc: AUSA Brett Kalikow